



I. Introduction, Purpose and Scope

CRH is committed to the highest level of legal, ethical and moral standards, as set out in the Group's Code of Business Conduct. We believe in operating in a free and open market, where competition drives efficiency and innovation, and companies compete on a level-playing field.

With that in mind, we must comply with competition laws applicable in those countries where we are present.

II. Statement of Policy

All CRH companies, employees, and anyone acting on behalf of CRH, must comply with relevant competition laws.

- Do not share commercially sensitive information with competitors including information about prices, margins, discounts or other terms or conditions of sale, production, volume, sales territories, and/or commercial or marketing strategies
 - Avoid contact of any kind with competitors that could create the appearance that CRH is not acting independently
 - Actively disassociate yourself from any situations in which improper information is shared by competitors (even if in error) and promptly seek legal advice
 - Do not enter into implicit or explicit agreements with competitors to fix or control prices, discounts, rebates or credit terms; to allocate contracts, markets, customers or territories; to boycott certain customers or suppliers; to refrain from or limit the manufacture or sale of any product or to manipulate the bidding process
 - Do not obtain market intelligence from sources that do not directly or indirectly involve communications with competitors, and appropriately record those sources
 - Ensure trade association membership, participation, and activities are in accordance with the principles of this Policy
- Always obtain legal advice before discussing, engaging in or implementing, any of the following:
 - Setting below cost prices
 - Refusing to supply products to certain customers
 - Agreeing to sell to a customer if they only buy from you
 - Requiring a customer to purchase one product before supplying another
 - Distributing, supplying or other collaborative arrangements with competitors
 - Joining, or exchanging information within, a trade association
 - Joint bidding arrangements with a competitor
 - Exclusive arrangements
 - Price discounts that depend on loyalty or volume or are only offered to certain customers
 - Non-compete or non-solicitation agreements
 - Any proposed merger, acquisition or joint venture
 - Always contact Legal and Compliance when you have been asked by a competition/antitrust authority to give information in relation to a competition, merger or market investigation. Legal and Compliance must approve any response to a competition/antitrust authority

III. Roles and Responsibilities

Employees must:

- Comply with all applicable competition/antitrust laws. Violation of the law is never in CRH's best interests
- Not share commercially sensitive information with competitors
- Avoid contact with competitors that could create the appearance that CRH is not acting independently
- Not enter into implicit or explicit agreements with competitors
- Actively disassociate yourself from any situations in which improper information is shared by competitors
- Ensure trade association membership, participation, and activities are in accordance with the principles of this Policy
- Participate in any relevant training programme provided

Company Management must:

- Annually confirm its compliance with this Policy
- Ensure that all relevant employees requiring competition law training are properly identified, receive the training, and acknowledge compliance with this Policy
- Set an appropriate tone at the top to ensure that employees are aware of their obligations
- Ensure anyone acting on its behalf are aware of their obligations under this Policy
- Ensure that each site is equipped to respond appropriately should a government authority arrive to conduct a surprise investigation (a "dawn raid"). This includes ensuring that:
 - Written procedures are available at each site
 - Site managers, security, and reception staff are appropriately trained on the procedures

Competition/Antitrust Policy continued

IV. Monitoring, Assurance and Breach Reporting

Monitoring

Internal Audit may report areas of concern about this Policy to Legal and Compliance. CRH may also review employees' activities, including company e-mails, to ensure compliance with this Policy.

Compliance with this Policy will be monitored as part of the Legal and Compliance cycle. Matters identified will be reported to the relevant stakeholders, including the Audit Committee.

Assurance

Competition law training is mandatory for certain CRH employees to help them understand relevant competition laws and identify potential red flags in their day-to-day operations. Legal and Compliance will coordinate these training efforts with all CRH companies. If you would like further information/training on competition law, please contact Legal and Compliance.

If CRH employees have any competition law questions or identify any potential red flags, they must consult Legal and Compliance before moving forward with their business strategy. Mark any e-mail correspondence related to competition law questions as "Request for legal advice: privileged & confidential".

Violations of competition laws could subject CRH to significant civil and criminal penalties, debarment, damages actions by third parties and harm its reputation and brands. Individuals can be subject to civil and criminal penalties, disqualification and imprisonment. CRH takes violation of competition laws seriously.

Reporting

Any employee who violates the law or fails to determine in advance whether his or her conduct is appropriate, is acting individually and without CRH authority.

Failure to comply with this Policy, either intentionally or through negligence, may result in disciplinary procedures being fully enforced, including termination of employment and or relevant contracts.

If you suspect that competition laws have been breached, you must immediately contact Legal and Compliance by telephone.

Suspected or actual breaches of this Policy may be reported confidentially via the CRH Hotline.

V. Relevant Contact Details

In the event of any questions with regards to the content, context or meaning of this document, please contact your local compliance contact or the Legal and Compliance team.

Responsibility	Name	Email	Direct Dial
General Counsel - Corporate	Aisling McKeown	amckeown@crh.com	+353 87 406 4005
General Counsel - Europe and Asia	Niamh Flood	nflood@crh.com	+353 87 622 0451
General Counsel - North Americas	Dave Toolan	david.toolan@crh.com	+1 404 216 8706
Global Head of Compliance	Elizabeth Upton	eupton@crh.com	+353 87 256 1045

VI. Supplementary Documentation

- Code of Business Conduct